

# PYXIS REGULATORY CONSULTING, INC.

49234200

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October 17, 2013

## COURIER DELIVERY

Jacqueline Campbell-McFarlane (PM 34)  
Document Processing Desk (**REGFEE**)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

RE: Alligare, LLC – Alligare 9% Copper (EPA Reg. No. 81927- )  
Application for New Pesticide Registration

Dear Ms. Campbell-McFarlane,

On behalf of Alligare, LLC please find the enclosed application for registration of Alligare 9% Copper, an end-use product containing copper ethanolamine complex, mixed (combination of Mono CAS# 14215-52-2 and Tri CAS# 82027-59-6) as the active ingredient. In support of this application, we submit the following documents:

1. Application for Registration (EPA Form 8570-1)
2. Receipt of PRIA pre-payment from pay.gov
3. Confidential Statement of Formula (Basic formulation dated October 15, 2013)
4. Five (5) copies of the proposed labeling
5. Certification with Respect to Label Integrity
6. Electronic copy of the Alligare 9% Copper label on CD
7. Formulator's Exemption Statement (EPA Form 8570-27)
8. Certification with Respect to Citation of Data (EPA Form 8570-34)
9. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
10. Public File Copy of the Data Matrix (EPA Form 8570-35)
11. Letter of Authorization
12. Product Specific Data:

Volume 1 <b>49234201</b>	830.1550, 830.1600, 830.1650, 830.1670, 830.1750, 830.1800	Kellogg, M., Product Identity and Composition, Description of the Materials Used, Description of the Formulation Process, Discussion of the Formation of Impurities, Certified Limits, and Analytical Methods to Verify Certified Limits for Alligare 9% Copper.
Volume 2 <b>49234202</b>	830.6302, 830.6303, 830.6304, 830.6314, 830.6317, 830.6320, 830.7000, 830.7100, 830.7300	Miller, R., Physical and Chemical Characteristics of Bravo Allig 9%.
Volume 3 <b>49234203</b>	830.6313, 830.6315, 830.6316, 830.6319, 830.6321, 830.7050,	Kellogg, M., Waiver Request for Certain Data Requirements for Alligare 8% Copper.

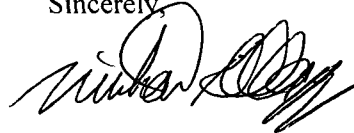
	830.7200, 830.7220, 830.7370, 830.7520, 830-7550-830.7570, 830.7840-830.7860, 830.7950	
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**Please note:** Bravo Allig 9% and Alligare 9% Copper are the same product. Alligare changed the product name prior to submission of the application for registration.

Alligare, LLC believes its product, Alligare 9% Copper, is substantially similar to a currently registered product (EPA Reg. No. 8959-10). Alligare, LLC believes this application falls under Category A530 (77) since Alligare 9% Copper is a new product, substantially similar in composition and use to a registered product, only product chemistry data are being submitted to support the application for registration and the cite-all option under the selective method is being used to support product specific acute toxicity data requirements.

We trust you will find this application complete and in compliance with the requirements for registration under FIFRA. Please feel free to call me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

